

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,  Trustee-Applicant,  v.  BERNARD L. MADOFF INVESTMENT SECURITIES LLC,  Defendant.	Adv. Pro. No. 08-01789 (SMB)  SIPA Liquidation  (Substantively Consolidated)
In re:  BERNARD L. MADOFF,  Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,  Trustee,  v.  NATIXIS, NATIXIS CORPORATE & INVESTMENT BANK (f/k/a IXIS CORPORATE & INVESTMENT BANK), NATIXIS FINANCIAL PRODUCTS, INC., BLOOM ASSET HOLDINGS FUND, and TENSYS LIMITED,  Defendants.	Adv. Pro. No. 10-05353 (SMB)

**SO-ORDERED STIPULATION EXTENDING TIME TO  
RESPOND AND ADJOURNING THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Trustee may respond to the Motions to Dismiss filed by Defendant Natixis Financial Products LLC (as successor in interest to Natixis Financial Products Inc.) (“Natixis FP”) is extended up to and including June 9, 2017. It is further stipulated and agreed that Natixis FP shall file its reply by September 1, 2017.

The pre-trial conference will be adjourned from to July 26, 2017 at 10:00 a.m. to October 25, 2017 at 10:00 a.m. The return date for this matter was previously set for June 28, 2017 at 10:00 a.m. but will be rescheduled for September 27, 2017 at 10:00 a.m.

The purpose of this stipulated extension (the “Stipulation”) is to provide adequate time for the Trustee to seek resolution of a protocol going forward as to the remaining claims against Natixis FP (certain of the claims having been dismissed by the Court’s Order, dated March 9, 2017 [ECF No. 129]).

The extension of time granted by this Stipulation is without prejudice to any future extensions of time.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses the Trustee and Natixis FP may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences. *In re BLMIS*, Adv. Pro. No. 08-01789 (SMB) (Bankr. S.D.N.Y. Nov. 17, 2016), ECF No. 14447.

Dated: March 28, 2017  
New York, New York

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Liquidation of Bernard L. Madoff  
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of Bernard L. Madoff*

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*Attorneys for Defendant Natixis Financial  
Products LLC (as successor in interest to  
Natixis Financial Products Inc.)*

**SO ORDERED**

Dated: March 28<sup>th</sup>, 2017  
New York, New York

/s/ STUART M. BERNSTEIN  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE